

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

3. The Correspondent Banks that the JOLS are seeking authorization to issue subpoenas to either reside or are found in the Southern District because they are subject to general personal jurisdiction and/or specific personal jurisdiction.

4. The Correspondent Banks (excluding CHPC and Goldman Sacs), are either participants in the Clearing House Interbank Payments System (“CHIPS”), which is the largest private sector U.S. Dollar clearing system in the world, the Federal Reserve’s Fedwire Fund Service (“Fedwire”), or a major participant in the clearing of international U.S. Dollar denominated transfers. CHIPS is operated by the CHPC through the Southern District, and is the largest private sector US dollar clearing system in the world, clearing and settling approximately US\$1.8 trillion in domestic and international payments per day.² All transfers processed through CHIPS clear the Southern District, where CHIPS is located. The information sought by the JOLs relates directly to the business transacted by each of the Correspondent Banks in the Southern district – records of transfers denominated in US dollars that cleared through CHIPS, Fedwire, or similar systems.

5. Attached hereto as Exhibit 1 is a true and correct copy of a webpage retrieved from CHPC’s official website providing a list of CHIPS participants.³ See Exhibit 1.

6. Attached hereto as Exhibit 2 is a true and correct copy of webpages retrieved from Fedwire’s official website showing certain of the Correspondent Banks as Fedwire participants. See Exhibit 2.

7. Through this Application, the JOLs seek the Requested Discovery – documents and information in the possession or control of the Correspondent Banks in relation to, *inter alia*, USD

² See <https://www.theclearinghouse.org/payment-systems/chips> (last visited on September 10, 2021) (generally describing the CHIPS system).

³ See [theclearinghouse.org/-/media/new/tch/documents/payment-systems/chips_participants_revised_01-25-2021.pdf](https://www.theclearinghouse.org/-/media/new/tch/documents/payment-systems/chips_participants_revised_01-25-2021.pdf) (last visited on September 10, 2021) (identifying the CHIPS participants).

transactions and transfers made by the Transferees during the period from January 1, 2009 through June 18, 2018. The JOLs investigation to date indicates that the Correspondent Banks would have processed such USD transactions and transfers. In fact, the JOLs have already identified certain bank accounts through which certain of the transfers were processed, and have identified the likely Correspondent Banks related to such account. See ¶¶ 28, 29 and Schedule B to the Amended Declaration of Stuart Sybersma as Joint Official Liquidator of Abraaj Investment Management Limited in Support of Application, dated September 16, 2021 (the “Sybersma Declaration”).⁴ The JOLs investigation revealed that other transfers occurred through other bank accounts, and the Correspondent Banks are likely to have served as correspondent banks for U.S. Dollar transfers.

A) Bank of New York Mellon

8. The Bank of New York Mellon (“Bank of New York”) is a financial services institution that regularly transacts business in the Southern District and maintains its corporate headquarters in the Southern District at 240 Greenwich Street, New York, New York 10286. See Exhibit 3 at p. 2.⁵ Bank of New York in New York City is a CHIPS and Fedwire participant. See Exhibit 1, p. 2 and Exhibit 2, p. 2.

9. Bank of New York in New York City is a correspondent bank for Credit Suisse (see Exhibit 4, p. 2.⁶) and Commercial Bank of Dubai (“CBD”) for U.S. Dollar funds transfers. See Exhibit 5, p. 1416–1417⁷. The JOLs investigation has revealed sums being transferred from AIML

⁴ (ABN Amro – Bank of America and Wells Fargo; Standard Chartered – Standard Chartered; RBS – Wells Fargo; Credit Suisse – Bank of New York; CBD (Commercial Bank of Dubai) – Citibank, Deutsche Bank Trust, Standard Chartered and Bank of New York; Mashreqbank – Mashreqbank NY, and Bank of America; Barclays - Barclays Bank PLC, New York).

⁵ See <https://www.bnymellon.com/us/en/contact-us.html> (last visited on September 9, 2021) (indicating the address of Bank of New York’s headquarters in New York City).

⁶ Exhibit 4 is a true and correct copy of a PDF obtained from Credit Suisse’s official website on September 15, 2021.

⁷ Exhibit 5 contains excerpts from the Accuity Bank Directory, Worldwide Correspondents, for December 2017-2018 for the United Arab Emirates.

bank accounts to the Transferees' bank accounts at, among others, Credit Suisse and CBD. *See* Sybersma Declaration, ¶¶ 28-29, Schedule B. Accordingly, Bank of New York in New York City may have information regarding transactions and transfers made by the Transferees from bank accounts at Credit Suisse and CBD.

B) Citibank, N.A.

10. Citibank, N.A. ("Citibank") is a financial services institution that regularly transacts business in the Southern District. Attached hereto as Exhibit 6 is a true and correct copy of Exhibit 21 to the Form 10-K filed with the United States Securities and Exchange Commission (the "SEC") by Citigroup, Inc. ("Citigroup") on February 26, 2021, which lists Citibank as a wholly-owned subsidiary of Citigroup. *See* Exhibit 6, p. 1. Citigroup's global headquarters is located in the Southern District at 388 Greenwich Street, New York, NY 10013. *See* Exhibit 7, pp. 1, 2⁸. Citibank in New York City is a CHIPS and Fedwire participant. *See* Exhibit 1, p. 1 and Exhibit 2, p. 3.

11. Citibank in New York City is a correspondent bank for CBD for U.S. Dollar funds transfers. *See* Exhibit 5, p. 1416–1417. The JOLs investigation has revealed sums being transferred from AIML bank accounts to the Transferees' bank accounts at, among others, CBD. *See* Sybersma Declaration, ¶¶ 28-29, Schedule B. Accordingly, Citibank in New York City may have information regarding transactions and transfers made by the Transferees from bank accounts at CBD.

C) Deutsche Bank AG, New York Branch

12. Deutsche Bank AG, New York Branch ("Deutsche Bank USA") is a financial services institution that regularly transacts business in the Southern District and has its

⁸ *See* <https://www.citigroup.com/citi/about/countries-and-jurisdictions/united-states-usa.html> (last visited on September 9, 2021) (indicating the address of Citigroup's headquarters in New York City).

headquarters located in the Southern District at 60 Wall Street, New York, New York. *See Exhibit 8*, p. 1.⁹ Deutsche Bank USA in New York City is a CHIPS and Fedwire participant. *See Exhibit 1*, p. 2 and *Exhibit 2*, p. 5.

D) Deutsche Bank Trust Company Americas

13. Deutsche Bank Trust Company Americas (“Deutsche Bank Trust”) is a financial services institution that regularly transacts business in the Southern District and has its main office located in the Southern District at 60 Wall Street, New York, New York 10005. *See Exhibit 9*, p. 1.¹⁰ Deutsche Bank Trust in New York City is a CHIPS and Fedwire participant. *See Exhibit 1*, p. 2 and *Exhibit 2*, p. 4.

14. Deutsche Bank Trust in New York City is a correspondent bank for CBD for U.S. Dollar funds transfers. *See Exhibit 5*, p. 1416–1417. The JOLs investigation has revealed sums being transferred from AIML bank accounts to the Transferees’ bank accounts at, among others, CBD. *See Sybersma Declaration*, ¶¶ 28-29, Schedule B. Accordingly, Deutsche Bank Trust in New York City may have information regarding transactions and transfers made by the Transferees from bank accounts at CBD.

E) Goldman Sachs & Co. LLC

15. Goldman Sachs & Co. LLC (“Goldman Sachs”) is a financial services institution that regularly transacts business in the Southern District. Attached hereto as *Exhibit 10* is a true and correct copy of the Form 10-K filed with the SEC by Goldman Sachs BDC, Inc. (“Goldman”) on February 25, 2021, which lists Goldman Sachs & Co. LLC as a wholly owned subsidiary of

⁹ *See* <https://country.db.com/usa/contact> (last visited on September 9, 2021) (indicating the address of Deutsche Bank USA’s headquarters).

¹⁰ *See* <https://banks.data.fdic.gov/bankfind-suite/bankfind/details/623?activeStatus=0%20OR%201&bankfindLevelThreeView=Institution%20Profile&branchOffices=true&name=Deutsche%20Bank%20Trust%20Company%20Americas&pageNumber=1&resultLimit=25> (last visited on September 9, 2021) (indicating the address of Deutsche Bank Trust’s main office in New York City).

The Goldman Sachs Group, Inc. (“Group Inc.”) See Exhibit 10, pp. 4, 38. Group Inc. is headquartered in the Southern District at 200 West Street, New York, NY, 10282. *Id.* at p. 1, 12.

F) **HSBC Bank USA Inc.**

16. HSBC Bank USA, N.A. (“HSBC”) is a financial services institution that regularly transacts business in the Southern District. Attached hereto as Exhibit 11 is a true and correct copy of the Form 10-K filed with the SEC by HSBC USA Inc. (“HSBC Inc.”) on February 23, 2021, which lists HSBC as a subsidiary of HSBC Inc. See Exhibit 11, p. 4. HSBC Inc.’s principal executive office is located in the Southern District at 452 Fifth Avenue, New York, New York 10018. *Id.* at p. 1. HSBC in New York City is a CHIPS participant. See Exhibit 1, p. 2.

G) **JPMorgan Chase & Co.**

17. J.P. Morgan Chase Bank, N.A. (“J.P. Morgan”) is a financial services institution that regularly transacts business in the Southern District. Attached hereto as Exhibit 12 is a true and correct copy of Exhibit 21 to the Form 10-K filed with the SEC by JPMorgan Chase & Co. on February 23, 2021, which lists J.P. Morgan as a wholly-owned subsidiary of JPMorgan Chase & Co. See Exhibit 12, at p. 1. Attached hereto as Exhibit 13 is a true and correct copy of the Form 8-K filed with the SEC by JPMorgan Chase & Co. on August 10, 2021, which lists JPMorgan Chase & Co.’s principal executive offices in the Southern District at 383 Madison Avenue, New York, New York, 10179. See Exhibit 13, p. 1. J.P. Morgan in New York City is a CHIPS participant. See Exhibit 1, p. 2.

H) **Standard Chartered Bank US**

18. Standard Chartered Bank US (a/k/a/ Standard Chartered Bank, New York Branch) (“Standard Chartered”) is a financial services institution that regularly transacts business in the Southern District and maintains its United States headquarters in the Southern District at 1095

Avenue of the Americas, New York, New York, 10036. *See Exhibits 14*, p. 2¹¹ and *Exhibit 15*, p. 2.¹² Standard Chartered in New York City is a CHIPS and Fedwire participant. *See Exhibit 1*, p. 2 and *Exhibit 2*, p. 10.

19. Standard Chartered in New York City is a correspondent bank for CBD (*see Exhibit 5*, p. 1416–1417) and Standard Chartered Bank for U.S. Dollar funds transfers. *See Exhibit 16*.¹³ The JOLs investigation has revealed sums being transferred from AIML bank accounts to the Transferees’ bank accounts at, among others, CBD and Standard Chartered. *See Sybersma Declaration*, ¶¶ 28-29, Schedule B. Accordingly, Standard Chartered in New York City may have information regarding transactions and transfers made by the Transferees from bank accounts at CBD and Standard Chartered Bank.

I) Barclays Bank PLC, New York Branch

20. Barclays Bank PLC, New York Branch (“Barclays”) is a financial services institution that regularly transacts business in the Southern District and maintains its United States headquarters in the Southern District at 745 Seventh Avenue, New York, New York 10019. *See Exhibit 17*, p. 2¹⁴ and *Exhibit 18*, p. 3¹⁵. Barclays in New York City is a CHIPS and Fedwire participant. *See Exhibit 1*, p. 1 and *Exhibit 2*, p. 7.

¹¹ *See* <https://www.sc.com/us/about> (last visited on September 9, 2021) (indicating that Standard Chartered’s United States headquarters are located in New York)

¹² *See* <https://www.sc.com/en/our-locations/#americas> (last visited on September 9, 2021) (indicating that the address of Standard Chartered’s United States office is located in the Southern District).

¹³ *See* <https://av.sc.com/corp-en/content/docs/pvb-uk-electronic-transfers-information.pdf> (last visited on September 15, 2021) (listing Standard Chartered in New York City as the correspondent bank for Standard Chartered Bank).

¹⁴ *See* <https://www.investmentbank.barclays.com/contact-us/us.html> (last visited on September 11, 2021) (listing Barclays’s New York office located in the Southern District).

¹⁵ *See* <https://home.barclays/careers/barclays-office-locations> (last visited on September 13, 2021) (listing the New York City office as Barclays’s United States headquarters).

21. Barclays located in New York City is a correspondent bank for Barclays Bank UK PLC for U.S. Dollar funds transfers. *See Exhibit 19*, p. 1.¹⁶ The JOLs investigation has revealed sums being transferred from AIML bank accounts to the Transferees' bank accounts at, among others, Barclays. *See Sybersma Declaration*, ¶¶ 28-29, Schedule B. Accordingly, Barclays in New York City may have information regarding transactions and transfers made by the Transferees from bank accounts at Barclays Bank UK PLC.

J) Société Générale, New York

22. Société Générale, New York ("Société Générale") is a financial services institution that regularly transacts business in the Southern District and maintains a New York head office located in the Southern District at 245 Park Avenue, New York, New York 10167. *See Exhibit 20*, p. 1.¹⁷ Société Générale in New York City is a CHIPS and Fedwire participant. *See Exhibit 1*, p. 2 and *Exhibit 2*, p. 9.

K) BNP Paribas USA Inc.

23. BNP Paribas USA Inc. ("BNP") is a financial services institution that regularly transacts business in the Southern District and maintains its New York headquarters located in the Southern District at 787 Seventh Avenue – The Equitable Tower, New York, New York 10019. *See Exhibit 21*, p. 1¹⁸ and *Exhibit 22*, p. 1.¹⁹ BNP in New York City is a CHIPS and Fedwire participant. *See Exhibit 1*, p. 1 and *Exhibit 2*, p. 13.

¹⁶ *See* <https://www.barclays.co.uk/help/international/payments/making-and-receiving-international-payments/receive-money/> (last visited on September 15, 2021) (listing Barclays in New York City as the correspondent bank for Barclays Bank UK PLC).

¹⁷ *See* <https://americas.societegenerale.com/en/locations/worldwide-details/office/societe-generale-branch-americas-securities-llc> (last visited on September 9, 2021) (listing the New York head office in the Southern District).

¹⁸ *See* <https://www.linkedin.com/company/bnp-paribas-usa-inc.> (last visited on September 13, 2021) (listing BNP's headquarters in New York, New York).

¹⁹ *See* <https://usa.bnpparibas/en/contact-us/bnp-paribas-corporate-institutional-banking/> (last visited on September 10, 2021) (listing the address for BNP's New York office in the Southern District).

L) UBS AG, New York Branch

24. UBS AG, New York Branch (“UBS”) is a financial services institution that regularly transacts business in the Southern District and maintains its New York Headquarters in the Southern District at 1285 Avenue of the Americas. *See Exhibit 23*, p. 1.²⁰ UBS AG in New York City is a CHIPS and Fedwire participant. *See Exhibit 1*, p. 3 and *Exhibit 2*, p. 11.

M) Bank of America, N.A.

25. Bank of America, N.A. (“Bank of America”) is a financial services institution that regularly transacts business in the Southern District and maintains at least fifty-nine (59) branches in New York City. *See Exhibit 24*, p. 3-5, 7-10, 12-14.²¹ Bank of America in New York City is a CHIPS and Fedwire participant. *See Exhibit 1*, p. 1 and *Exhibit 2*, p. 1.

26. Bank of America is a correspondent bank for Mashreqbank PSC (*see Exhibit 25*, p. 3²²) and ABN Amro for U.S. Dollar funds transfers. *See Exhibit 26*, p. 4.²³ The JOLs investigation has revealed sums being transferred from AIML bank accounts to the Transferees’ bank accounts at, among others, Mashreqbank PSC and ABN Amro. *See Sybersma Declaration*, ¶¶ 28-29, Schedule B. Accordingly, Bank of America in New York City may have information regarding transactions and transfers made by the Transferees from bank accounts at Mashreqbank PSC and ABN Amro.

²⁰ *See* <https://local.ubs.com/nyc-1285-aoa-jg/> (last visited on September 9, 2021) (listing UBS’s New York headquarters in the Southern District).

²¹ *See* <https://banks.data.fdic.gov/bankfind-suite/bankfind?activeStatus=0%20OR%201&branchOffices=true&name=Bank%20of%20America%2C%20National%20Association&pageNumber=1&resultLimit=25> (last visited on September 10, 2021) (listing the addresses of the Bank of America locations in New York City).

²² *See* https://banks-uae.blogspot.com/2018/09/bank-in-uae-correspondent-bank-details_96.html (last visited on September 15, 2021) (listing correspondent banks for MashreqBank PSC).

²³ *See* <https://banks-uae.blogspot.com/2018/06/bank-in-uae-corresapondent-bank-details.html> (last visited on September 15, 2021) (listing correspondent banks for ABN Amro).

N) **Wells Fargo Bank, N.A.**

27. Wells Fargo Bank N.A. (“Wells Fargo”) is a financial services institution that regularly transacts business in the Southern District and maintains at least 29 branches in New York City. *See Exhibit 27*, p. 4-5 and 14-17.²⁴ Wells Fargo in New York City is a CHIPS and Fedwire participant. *See Exhibit 1*, p. 3, *Exhibit 2*, p. 12.

28. Wells Fargo in New York City is a correspondent bank for ABN Amro (*see Exhibit 26*, p. 4) and the Royal Bank of Scotland for U.S. Dollar funds transfers. *See Exhibit 28*, p. 1.²⁵ The JOLs investigation has revealed sums being transferred from AIML bank accounts to the Transferees’ bank accounts at, among others, ABN Amro and the Royal Bank of Scotland. *See Sybersma Declaration*, ¶¶ 28-29, Schedule B. Accordingly, Wells Fargo in New York City may have information regarding transactions and transfers made by the Transferees from bank accounts at ABN Amro and the Royal Bank of Scotland.

O) **Mashreqbank PSC, New York Branch**

29. Mashreqbank PSC, New York Branch (“Mashreqbank”) is a financial services institution that regularly transacts business in the Southern District and maintains an exclusive correspondent banking branch in the United States in the Southern District at 50 Broadway, Suite 1500, New York, New York 10004. *See Exhibit 29*, p. 1.²⁶ Mashreqbank in New York City is a CHIPS participant. *See Exhibit 1*, p. 2.

30. Mashreqbank in New York City acts a correspondent bank for Mashreqbank PSC for U.S. Dollar funds transfers. *See Exhibit 5*, p. 1419–1420. The JOLs investigation has revealed

²⁴ *See* <https://banks.data.fdic.gov/bankfindsuite/bankfind?activeStatus=0%20OR%201&branchOffices=true&name=Wells%20Fargo%20Bank%2C%20National%20Association&pageNumber=1&resultLimit=25> (last visited on September 10, 2021) (listing the addresses of the Wells Fargo bank locations in New York City).

²⁵ Exhibit 27 is a PDF document obtained from the Royal Bank of Scotland’s official website, listing Wells Fargo as a correspondent bank.

²⁶ *See* <https://www.mashreqbank.com/qatar/en/international-banking/network/usa> (last visited on September 9, 2021) (listing the New York Branch located in the Southern District as the exclusive correspondent banking branch).

sums being transferred from AIML bank accounts to the Transferees' bank accounts at, among others, Mashreqbank PSC. *See* Sybersma Declaration, ¶¶ 28-29, Schedule B. Accordingly, Mashreqbank in New York City may have information regarding transactions and transfers made by the Transferees from bank accounts at Mashreqbank PSC.

P) Bank of Nova Scotia

31. Bank of Nova Scotia ("BNS"), operating as Scotiabank, is a financial services institution that regularly transacts business in the Southern District and maintains an office in the United States located in the Southern District at 250 Vesey Street, 23rd and 24th Floors, New York, New York 10281. *See* Exhibit 30, p. 1.²⁷ BNS is a Fedwire participant. *See* Exhibit 2, p. 6.

Q) Commerzbank AG, New York Branch

32. Commerzbank AG, New York Branch ("Commerzbank") is a financial services institution that regularly transacts business in the Southern District and maintains a New York branch in the Southern District located at 225 Liberty Street, New York, New York 10281. *See* Exhibit 31, p. 1.²⁸ Commerzbank in New York City is a CHIPS and Fedwire participant. *See* Exhibit 1, p. 1 and Exhibit 2, p. 8.

R) The Clearing House Payments Company LLC

33. The Clearing House Payments Company LLC (the "CHPC") provides transmission of instruction messages and settlement of funds between financial institutions that are used to process international U.S. Dollar funds transfers made among international banks. CHPC

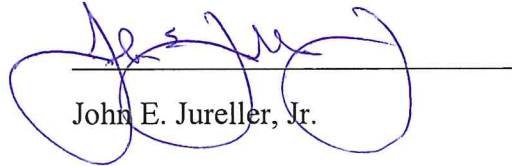
²⁷ *See* <https://www.scotiabank.com/global/en/country/united-states-of-america.html> (last visited on September 13, 2021) (listing BNS's office in the United States located in the Southern District).

²⁸ *See* https://www.worldwide.commerzbank.com/en/home/inhalte/niederlassungsseite_5537.jsp?type=outlet (last visited on September 9, 2021) (listing the address of the New York branch in the Southern District).

maintains its headquarters in the Southern District at 450 West 33rd Street, New York, New York 10001. See Exhibit 32, p. 2²⁹ and Exhibit 33, p. 1.³⁰

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: September 16, 2021


John E. Jureller, Jr.

²⁹ See <https://www.linkedin.com/company/the-clearing-house> (last visited on September 10, 2021) (listing CHPC's headquarters in New York, New York).

³⁰ See <https://www.bbb.org/us/ny/new-york/profile/sweepstakes/the-clearing-house-payments-company-llc-0121-119577> (last visited on September 14, 2021) (indicating the address of CHPC in the Southern District).